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7 Attorneys for Defendant

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF ARIZONA**

10 United States of America,
11
12 Plaintiff,

13 v.

14 Abdul Malik Abdul Kareem,
15
16 Defendant.

No. CR 15-00707-PHX-SRB

**DEFENDANT'S NOTICE OF INTENT TO
INTRODUCE EXPERT WITNESS
TESTIMONY**

17 Defendant, Abdul Malik Abdul Kareem ("Mr. Abdul Kareem"), by and through
18 undersigned counsel, pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure,
19 gives notice of his intent to use expert witness testimony under Rules 702, 703, or 705 of the
20 Federal Rules of Evidence at trial.

21 1. James Carrieres, Forensic Computer Examiner.

22 Mr. Abdul Kareem intends to introduce factual and expert testimony regarding his
23 forensic examination of the hard drives and flash drive provided by the government, purported
24 to be the computers, digital storage data and cell phone data the Government has obtained in
25 this case. Mr. Carrieres' CV will be disclosed under separate cover.

26 2. Daveed Gartenstein-Ross.

Mr. Abdul Kareem intends to introduce factual and expert testimony concerning the
criteria used to establish if someone is a radicalized terrorist and whether Mr. Abdul Kareem
fits into that criteria. Dr. Gartenstein-Ross' CV will be disclosed under separate cover.

3. Marc Sageman, M.D., Ph.D.

Mr. Abdul Kareem intends to introduce factual and expert information regarding terrorism, radicalization, and Mr. Abdul Kareem's association or lack thereof. Dr. Sageman's CV will be disclosed under separate cover.

4. One or two representatives of the Muslim Community.

Mr. Abdul Kareem intends to introduce factual and expert testimony concerning the tenants of the Muslim religion and to provide background to the jury on Islam and its place in the Phoenix community.

5. An electronic device analyst.

Mr. Abdul Kareem intends to introduce factual and expert testimony regarding the forensic analysis of electronic devices and analysis of the location of these devices based on historical records.

RESPECTFULLY SUBMITTED this 11th day of December, 2015.

**MAYNARD CRONIN ERICKSON
CURRAN & REITER, P.L.C.**

By /s/Daniel D. Maynard

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ORIGINAL of the foregoing e-filed this 11th day of December, 2015 via ECF with:
Clerk of the Court
United States District Court
401 W. Washington
Phoenix, AZ 85003

COPY of the foregoing e-delivered this 11th day of December, 2015 via ECF to:

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1 /s/Stacey Tanner

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